

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

_____)	
EDWIN HERNANDEZ,)	
ARLES GRANADOS LAZO,)	
JOSE ORTEZ, YERLIN ORTEZ,)	
MARTIR SORTO, AND)	
SANTOS VELASQUEZ,)	
)	
Plaintiffs,)	
)	
v.)	Civil Action No. 1:13-cv-10394-WGY
)	
GOLDEN APPLE, INC., POMODORO)	
NORTH END, INC., MATT MURPHY'S)	
PUB, INC., AND SIOBHAN CAREW)	
)	
Defendants.)	
_____)	

PLAINTIFFS' REQUEST FOR NOTICE OF DEFAULT

I, Michaela C. May, counsel for the Plaintiffs, certify as follows:

1. On **February 12, 2014**, the Plaintiffs filed their Third Amended Complaint ("the Complaint"), with this Court's leave to do so;
2. The Complaint — which among other things added a claim against Defendants Siobhan Carew and Golden Apple, Inc. — was served on Defendants, through counsel, via the CM/ECF system on the day of filing.
3. Defendants have not answered the Complaint or served any other response thereto;
4. I conferred with Defendants' counsel, to wit by telephone conferences and e-mails on March 3 and 12, 2014, in an effort to resolve Defendants' outstanding answer;
5. Therefore, I request that default be entered against all Defendants in this action and as to all Counts in the Complaint.

SIGNED UNDER THE PAINS AND PENALTIES OF PERJURY ON THIS 21ST DAY OF MARCH 2014.

/s/ Michaela C. May

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CERTIFICATE OF CONSULTATION

I, Michaela C. May, hereby certify that I conferred with Defendants' counsel of record in advance of filing this request in a good-faith attempt to resolve this issue, but that we were unable to reach an agreement that would forego the necessity of filing this request.

/s/ Michaela C. May

Michaela C. May, Esq.

CERTIFICATE OF SERVICE

I, Michaela C. May, hereby certify that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and paper copies will be sent to those indicated as non-registered participants on this date.

/s/ Michaela C. May

Michaela C. May, Esq.